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*Attorneys for General Motors LLC*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re	: Chapter 11
	:
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	: Case No.: 09-50026 (REG)
f/k/a General Motors Corp., <i>et al.</i>	:
	:
Debtors.	: (Jointly Administered)
-----X	

**NOTICE OF FILING OF THIRD SUPPLEMENT TO THE CHART OF PRE-CLOSING  
ACCIDENT LAWSUITS SET FORTH IN THE MOTION OF GENERAL  
MOTORS LLC PURSUANT TO 11 U.S.C. §§ 105 AND 363 TO ENFORCE  
THE COURT'S JULY 5, 2009 SALE ORDER AND INJUNCTION  
AGAINST PLAINTIFFS IN PRE-CLOSING ACCIDENT LAWSUITS**

**PLEASE TAKE NOTICE** that on February 13, 2015, General Motors LLC filed the attached *Third Supplement to the Chart of Pre-Closing Accident Lawsuits Set Forth in the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits* with the United States Bankruptcy Court for the Southern District of New York.

Dated: New York, New York  
February 13, 2015

Respectfully submitted,

/s/ Scott I. Davidson

Arthur Steinberg

Scott Davidson

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**THIRD SUPPLEMENT<sup>1</sup> TO CHART OF  
PRE-CLOSING ACCIDENT LAWSUITS  
COMMENCED AGAINST NEW GM NOT LISTED  
IN MOTION TO ENFORCE**

	<u>Lead Plaintiff Name</u>	<u>Date of Accident (Plaintiff)</u>	<u>Vehicle Year and Model</u>
1	Scott <sup>2</sup>	May 5, 2009	2007 Chevrolet HHR
2	Bachelder <sup>3</sup>	July 23, 2007 (Bachelder) April 2, 2007 (Bastidas) Black – No Date Specified <sup>4</sup> May 25, 2007 (Champagne) May 27, 2008 (Delp) January 10, 2007 (Dixon) March 7, 2007 (Edwards) January 4, 2009 (Fritze) April 9, 2006 (Kitzmiller Green) June 7, 2003 (Hankerson) January 23, 2007 (Jimenez) 2005 (Landry) September 13, 2002 (Lawrimore) February 14, 2009 (Shaffer)	2006 Chevy Cobalt 2006 Chevy Cobalt 2007 Chevy Cobalt 2007 Chevy Cobalt 2006 Chevy Cobalt 2003 Saturn Ion 2002 Cadillac Deville 2009 Chevy Cobalt 2006 Chevy Cobalt 1997 Pontiac Grand Am 2006 Chevy Cobalt 2007 Chevy Cobalt 1999 Pontiac Grand Prix 2006 Pontiac Grand Prix

<sup>1</sup> Pursuant to the *Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits* (the "**Motion to Enforce**") [Dkt. No. 12808-1], New GM reserved the right to supplement the list of Pre-Closing Accident Lawsuits set forth in the Motion to Enforce in the event additional cases were brought against New GM that implicate similar provisions of the Sale Order and Injunction. See Motion to Enforce, p. 7 n.6.

<sup>2</sup> The Action identified in the chart above is captioned *Scott v. General Motors Co., et al.* pending in the United States District Court for the Middle District of Florida (Tampa Division) (the "**Scott Action**"). A copy of the complaint filed in the Scott Action is attached hereto as Exhibit "A."

<sup>3</sup> The Action identified in the chart above is captioned *Bachelder, et al. v. General Motors LLC*. pending in the United States District Court for the Southern District of New York (the "**Bachelder Action**"). A copy of the complaint filed in the Scott Action is attached hereto as Exhibit "B."

<sup>4</sup> The complaint in the Bachelder Action alleges that Plaintiff Benita Black was driving a 2007 Chevy Cobalt when the steering locked, resulting in a crash and injuries. The complaint, however, fails to specify the specific date or year of the alleged accident. As such, it is unclear at this time, if Plaintiff Black's accident occurred prior to the closing of the 363 Sale or after. To the extent the accident occurred prior to the closing of the 363 Sale, any claims based thereon are subject to the Motion to Enforce.

		November 2, 2007 (Simecek) March 29, 2006 (Slade) February 25, 2007 (Stafford) August 28, 2008 (Weisjahn) April 17, 2009 (Wilson)	2006 Chevy Cobalt 2005 Chevy Cobalt 2006 Chevy Colorado 2006 Chevy HHR 2007 Chevy Cobalt
3	Bacon <sup>5</sup>	August 12, 2008	2004 Oldsmobile Alero

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<sup>5</sup> The Action identified in the chart above is captioned *Bacon v. General Motors, LLC* pending in the United States District Court for the Southern District of New York (the “**Bacon Action**”). A copy of the complaint filed in the Bacon Action is attached hereto as Exhibit “C.”